

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL**

**Indiana Department of Environmental Management,
Office of Air Quality
and
City of Indianapolis, Office of Environmental Services**


**Bunge North America (East), Inc.
1102 West 18th Street
Indianapolis, Indiana 46202**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-17173-00008	
Issued by:  Felicia A. Robinson, Administrator Office of Environmental Services	Issuance Date: May 16, 2007 Expiration Date: May 16, 2012

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ), and the City of Indianapolis, Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary grain (including corn and soybeans) terminal.

Source Address:	1102 West 18th Street, Indianapolis, Indiana 46202
Mailing Address:	1102 West 18th Street, Indianapolis, Indiana 46202
General Source Phone Number:	(765) 763-7500
SIC Code:	5153
County Location:	Marion
Source Location Status:	Nonattainment for PM2.5
Source Status:	Nonattainment for ozone under the 8-hour standard
	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Emission Offset Rules
	Minor Source, Section 112 of the Clean Air Act
	Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

Receiving

- (a) One (1) Truck Pit Receiving Area No. 1, designated as Emission Unit ID R1, constructed in 1949, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 324 tons of grain per hour, exhausting to stack R1.
- (b) One (1) Truck and Rail Pit Receiving Area No. 2, designated as Emission Unit ID R2, constructed in 1964, using a baghouse and oil spray as control, with a maximum throughput of 400 tons of grain per hour, exhausting to stack R2.

Drying

- (c) One (1) Berico Column Grain Dryer, designated as Emission Unit ID GD, constructed in 1949, using a 300 micron mesh screen to remove large particles, with a maximum throughput of 45 tons of grain per hour, equipped with a 14.5 million British Thermal Unit (MMBTU) per hour natural gas combustion source, exhausting to stack GD.

Internal Operations

- (d) One (1) Grain Dryer Conveyance System, designated as Emission Unit ID GDCS, constructed in 1959, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 45 tons of grain per hour, exhausting to stack GDCS.
- (e) One (1) Tripper Equipment in Elevator Belt Conveying System, designated as Emission Unit ID TE, constructed in 1949, using two (2) baghouses and addition of oil to the grain as control, with a maximum throughput of 450 tons of grain per hour, exhausting to stacks TE-W and TE-E.

- (f) One (1) Loader Equipment in Elevator Belt Conveying System, designated as Emission Unit ID LE, constructed in 1949, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 450 tons of grain per hour, exhausting to stack LE.

Shipping

- (g) One (1) Elevator Grain Loadout, designated as Emission Unit ID EGLO, constructed in 1964, using addition of oil to the grain for particulate control, with a maximum throughput of 150 tons of grain per hour.
- (h) One (1) Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR), constructed in 1964, using addition of oil to the grain for particulate control, with a maximum capacity of 3.7 million bushels (111,000 tons).

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):

- (a) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (1) Bean Bowl Bin Vent aspiration of 0.005 grains/dry standard cubic foot having emissions less than permitting thresholds [326 IAC 6.5-1-2].
- (b) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.
- (d) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Asbestos abatement projects regulated by 326 IAC 14-10.
- (g) Purging of gas lines and vessels that are related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Underground conveyors.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and City of Indianapolis, OES to renew a Federally Enforceable State Operating Permit (FESOP).

SECTION B

GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5] [IC 13-15-3-6(a)]

- (a) This permit, 097-17173-00008, is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date of this permit.
- (b) If IDEM, OAQ, upon receiving a timely and complete renewal permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.3 Term of Conditions [326 IAC 2-1.1-9.5]

Notwithstanding the permit term of a permit to construct, a permit to operate, or a permit modification, any condition established in a permit issued pursuant to a permitting program approved in the state implementation plan shall remain in effect until:

- (a) the condition is modified in a subsequent permit action pursuant to Title I of the Clean Air Act; or
- (b) the emission unit to which the condition pertains permanently ceases operation.

B.4 Enforceability [326 IAC 2-8-6]

- (a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the City of Indianapolis, OES, and the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.
- (b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by OES.

B.5 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.7 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

- (a) The Permittee shall furnish to IDEM, OAQ, and the City of Indianapolis, OES, within a reasonable time, any information that IDEM, OAQ, and the City of Indianapolis, OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, and the City of Indianapolis, OES copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and the City of Indianapolis, OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.9 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.10 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the City of Indianapolis, OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

- (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and the City of Indianapolis, OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.11 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) A copy of the PMPs shall be submitted to IDEM, OAQ, and the City of Indianapolis, OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ, and the City of Indianapolis, OES. IDEM, OAQ, and the City of Indianapolis, OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMPs do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.12 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ and the City of Indianapolis, OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-0178 (ask for Compliance Section)

Facsimile Number: 317-233-6865

OES:

Telephone No.: 317-327-2237 (ask for Data Compliance)

Facsimile No.: 317-327-2274

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ, and the City of Indianapolis, OES, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

- (f) Failure to notify IDEM, OAQ and the City of Indianapolis, OES, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.
- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of permits established prior to 097-17173-00008 and issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deleted.
- (b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independently of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ and the City of Indianapolis, OES determines any of the following:
 - (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ or the City of Indianapolis, OES, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or the City of Indianapolis, OES, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or the City of Indianapolis, OES, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and the City of Indianapolis, OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, IN 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

(b) A timely renewal application is one that is:

- (1) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (2) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and City of Indianapolis, OES on or before the date it is due.

(c) If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and the City of Indianapolis, OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and the City of Indianapolis, OES, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document, all such changes and emissions trades that are subject to 326 IAC 2-8-15(b) through (d). The Permittee shall make such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and the City of Indianapolis, OES, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade emissions increases and decreases at the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

- (c) **Alternative Operating Scenarios [326 IAC 2-8-15(d)]**
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.
- (d) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.20 Source Modification Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1][IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, the City of Indianapolis, OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16] [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-8-4(3)][326 IAC 2-8-5][62 FR 8314][326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-3 (Emission Offset) not applicable;
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) The potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period. This limitation shall make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) not applicable.

(c) This overall source limit shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the Fugitive Dust Control Plan. The plan is included as Attachment A to this Permit. Records shall be kept of actions taken under the Fugitive Dust Control Plan. Records of actions taken shall be kept in accordance with Condition C.18 General Record Keeping Requirements.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

The Permittee shall comply with the applicable requirements of 326 IAC 14-10, 326 IAC 18, and 40 CFR 61.140.

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and the City of Indianapolis, OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, and the City of Indianapolis, OES if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

in writing, prior to the end of the initial ninety (90) day compliance schedule with full justification of the reasons for inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

C.13 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)] [326 IAC 2-8-5(1)]

- (a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.
- (b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted updated written emergency reduction plans (ERPs) consistent with safe operating procedures on October 24, 2006.
- (b) Upon direct notification by IDEM, OAQ and the City of Indianapolis, OES, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.16 Response to Excursions or Exceedances [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit(s) (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.
- (b) The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Corrective actions may include, but are not limited to, the following:
 - (1) initial inspection and evaluation;
 - (2) recording that operations returned to normal without operator action (such as through response by a computerized distribution control system); or
 - (3) any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

- (c) A determination of whether the Permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include, but is not limited to, the following:
 - (1) monitoring results;
 - (2) review of operation and maintenance procedures and records;
 - (3) inspection of the control device, associated capture system, and the process.
- (d) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (e) The Permittee shall maintain the following records:
 - (1) monitoring data;
 - (2) monitor performance data, if applicable; and
 - (3) corrective actions taken.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]**

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one hundred twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or the City of Indianapolis, OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or the City of Indianapolis, OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each

deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section, Permits
2700 South Belmont Avenue
Indianapolis, Indiana 46221

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and the City of Indianapolis, OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Receiving

- (a) One (1) Truck Pit Receiving Area No. 1, designated as Emission Unit ID R1, constructed in 1949, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 324 tons of grain per hour, exhausting to stack R1.
- (b) One (1) Truck and Rail Pit Receiving Area No. 2, designated as Emission Unit ID R2, constructed in 1964, using a baghouse and oil spray as control, with a maximum throughput of 400 tons of grain per hour, exhausting to stack R2.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP Limits PSD Minor Limits [326 IAC 2-2] [326 IAC 2-8]

- (a) The grain received by Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) shall not exceed 450,000 tons, combined, per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM emissions from the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) shall not exceed 0.18 pounds of PM per ton of grain received.
- (c) The PM10 emissions from the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) shall not exceed 0.06 pounds of PM10 per ton of grain received.

These limits, combined with the limits in Conditions D.2.1, D.3.1, D.4.1, and D.5.1, will limit source wide emissions of PM10 to less than 100 tons per year and source wide emissions of PM to less than 250 tons per year. Compliance with these limitations render the source a minor PSD source and the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.1.2 Particulate Matter [326 IAC 6.5-6-5]

Pursuant to 326 IAC 6.5-6-5 (Particulate Emission Limitations: Marion County), the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) are subject to the following limitations:

- (a) Particulate matter emissions from Truck Pit Receiving Area No. 1 (Unit ID R1) shall not exceed 7.23 tons per year and 0.006 grains per dry standard cubic foot.
- (b) Particulate matter emissions from Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) shall not exceed 4.95 tons per year and 0.006 grains per dry standard cubic foot.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]

Within 18 months after issuance of this FESOP permit, in order to demonstrate compliance with Conditions D.1.1 and D.1.2 the Permittee shall perform PM and PM10 stack testing for Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. Testing shall be

conducted in accordance with Section C - Performance Testing. PM10 includes filterable and condensable PM10.

D.1.5 Particulate Control [326 IAC 2-8-5(a)(4)]

- (a) In order to comply with Condition D.1.2, each baghouse for particulate control shall be in operation and control emissions from its respective emission unit, that is, Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) at all times that the associated emission units are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

- (a) Once per day visible emission notations of the Truck Pit Receiving Area No. 1 (Unit ID R1, stack R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2, stack R2) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.1.7 Parametric Monitoring

The Permittee shall record the pressure drop across each baghouse used in conjunction with the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) at least once per day when the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) are in operation. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.1.8 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately

until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain a monthly record of the combined total amount of grain received, in tons, by Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2).
- (b) To document compliance with Condition D.1.6, the Permittee shall maintain a daily record of visible emission notations of the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e. the process did not operate that day).
- (c) To document compliance with Condition D.1.7, the Permittee shall maintain a daily record of the pressure drop across the baghouse controlling the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (i.e. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Drying

- (c) One (1) Berico Column Grain Dryer, designated as Emission Unit ID GD, constructed in 1949, using a 300 micron mesh screen to remove large particles, with a maximum throughput of 45 tons of grain per hour, equipped with a 14.5 million British Thermal Unit (MMBTU) per hour natural gas combustion source, exhausting to stack GD.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 FESOP Limits PSD Minor Limits [326 IAC 2-2] [326 IAC 2-8]

- (a) The grain dried by the Berico Column Grain Dryer (Unit ID GD) shall not exceed 60,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM emissions from the Berico Column Grain Dryer (Unit ID GD) shall not exceed 0.22 pounds of PM per ton of grain received.
- (c) The PM10 emissions from the Berico Column Grain Dryer (Unit ID GD) shall not exceed 0.06 pounds of PM10 per ton of grain received.

These limits, combined with the limits in Conditions D.1.1, D.3.1, D.4.1, and D.5.1, will limit source wide emissions of PM10 to less than 100 tons per year and source wide emissions of PM to less than 250 tons per year. Compliance with these limitations render the source a minor PSD source and the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.2.2 Particulate Emission Limitations [326 IAC 6.5-1-2]

- (a) Pursuant to 326 IAC 6.5-1-2(d)(2), the Berico Column Grain Dryer (Unit ID GD) is subject to the following requirements:
- (1) Housekeeping practices shall be conducted as follows:
- (A) Areas to be swept and maintained shall include at a minimum:
- (i) General grounds, yard, and other open areas;
- (ii) Floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and
- (iii) Grain driers with respect to accumulated particulate matter.
- (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
- (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
- (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
- (A) Malfunctions.

- (B) Breakdowns.
 - (C) Improper adjustment.
 - (D) Operating above the rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventative maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.
- (b) Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emission Limitations), the particulate matter emissions for the Berico Column Grain Dryer process heater shall be limited to 0.03 grains per dry standard cubic foot.

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.4 Visible Emissions Notations

- (a) Once per day visible emission notations of the Berico Column Grain Dryer (Unit ID GD) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.5 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 the Permittee shall maintain a monthly record of the total amount of grain dried, in tons, by the Berico Column Grain Dryer (Unit ID GD).
- (b) To document compliance with Condition D.2.4, the Permittee shall maintain a daily record of visible emission notations of the Berico Column Grain Dryer (Unit ID GD) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Internal Operations

- (d) One (1) Grain Dryer Conveyance System, designated as Emission Unit ID GDCS, constructed in 1959, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 45 tons of grain per hour, exhausting to stack GDCS.
- (e) One (1) Tripper Equipment in Elevator Belt Conveying System, designated as Emission Unit ID TE, constructed in 1949, using two (2) baghouses and addition of oil to the grain as control, with a maximum throughput of 450 tons of grain per hour, exhausting to stacks TE-W and TE-E.
- (f) One (1) Loader Equipment in Elevator Belt Conveying System, designated as Emission Unit ID LE, constructed in 1949, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 450 tons of grain per hour, exhausting to stack LE.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 FESOP Limits PSD Minor Limits [326 IAC 2-2] [326 IAC 2-8]

- (a) The grain received by Grain Dryer Conveyance System (Unit ID GDCS) shall not exceed 60,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM emissions from the Grain Dryer Conveyance System (Unit ID GDCS) shall not exceed 0.06 pounds of PM per ton of grain received.
- (c) The PM10 emissions from the Grain Dryer Conveyance System (Unit ID GDCS) shall not exceed 0.03 pounds of PM10 per ton of grain received.
- (d) The grain received by Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) shall not exceed 450,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (e) The PM emissions from the Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) shall not exceed 0.06 pounds of PM per ton of grain received.
- (f) The PM10 emissions from the Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) shall not exceed 0.03 pounds of PM10 per ton of grain received.
- (g) The grain received by Loader Equipment in Elevator Belt Conveying System (Unit ID LE) shall not exceed 450,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (h) The PM emissions from the Loader Equipment in Elevator Belt Conveying System (Unit ID LE) shall not exceed 0.06 pounds of PM per ton of grain received.
- (i) The PM10 emissions from the Loader Equipment in Elevator Belt Conveying System (Unit ID LE) shall not exceed 0.03 pounds of PM10 per ton of grain received.

These limits, combined with the limits in Conditions D.1.1, D.2.1, D.4.1, and D.5.1, will limit source wide emissions of PM10 to less than 100 tons per year and source wide emissions of PM to less than 250 tons per year. Compliance with these limitations render the source a minor PSD source and the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.3.2 Particulate Matter [326 IAC 6.5-6-5]

Pursuant to 326 IAC 6.5-6-5 (Particulate Emission Limitations: Marion County) the Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE) are subject to the following limitations:

- (a) Particulate matter emissions from Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) shall not exceed 0.92 tons per year and 0.006 grains per dry standard cubic foot.
- (b) Particulate matter emissions from Loader Equipment in Elevator Belt Conveying System (Unit ID LE) shall not exceed 0.70 tons per year and 0.006 grains per dry standard cubic foot.
- (c) Particulate matter emissions from Grain Dryer Conveyance System (Unit ID GDCS) shall not exceed 1.01 tons per year and 0.006 grains per dry standard cubic foot.

D.3.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control device.

Compliance Determination Requirements

D.3.4 Particulate Control [326 IAC 2-8-5(a)(4)]

- (a) In order to comply with D.3.2, each baghouse for particulate control shall be in operation and control emissions from its respective emission unit, that is, the Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE) at all times that the Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE) are in operation.
- (b) In the event that bag failure is observed in a multi-compartment baghouse, if operations will continue for ten (10) days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.3.5 Visible Emissions Notations

- (a) Once per day visible emission notations of the Grain Dryer Conveyance System (Unit ID GDCS, stack GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE, stacks TE-E and TE-W), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE, stack LE) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

D.3.6 Parametric Monitoring

The Permittee shall record the pressure drop across each baghouse used in conjunction with the Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE), at least once per day. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit.

The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.7 Broken or Failed Bag Detection

- (a) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.3.8 Record Keeping Requirements

- (a) To document compliance with Condition D.3.1 the Permittee shall maintain monthly records of the combined total amount of grain processed, in tons, by Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE).
- (b) To document compliance with Condition D.3.5, the Permittee shall maintain a daily record of visible emission notations of the Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE) stack exhausts. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e. the process did not operate that day).
- (c) To document compliance with Condition D.3.6, the Permittee shall maintain a daily record of the pressure drop across each baghouse controlling the following processes: Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt

Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE). The Permittee shall include in its daily record when a pressure drop reading is not taken and the reason for the lack of a pressure drop reading (i.e. the process did not operate that day).

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.3.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.4

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Shipping

- (g) One (1) Elevator Grain Loadout, designated as Emission Unit ID EGLO, constructed in 1964, using addition of oil to the grain for particulate control, with a maximum throughput of 150 tons of grain per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.4.1 FESOP Limits PSD Minor Limits [326 IAC 2-2] [326 IAC 2-8]

- (a) The grain shipped by the Elevator Grain Loadout (Unit ID EGLO) shall not exceed 450,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month.
- (b) The PM emissions from the Elevator Grain Loadout (Unit ID EGLO) shall not exceed 0.09 pounds of PM per ton of grain shipped.
- (c) The PM10 emissions from the Elevator Grain Loadout (Unit ID EGLO) shall not exceed 0.03 pounds of PM10 per ton of grain shipped.

These limits, combined with the limits in Conditions D.1.1, D.2.1, D.3.1, and D.5.1, will limit source wide emissions of PM10 to less than 100 tons per year and source wide emissions of PM to less than 250 tons per year. Compliance with these limitations render the source a PSD minor source and the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.4.2 Particulate Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(d)(2), the Elevator Grain Loadout (Unit ID EGLO) is subject to the following requirements:

- (a) Housekeeping practices shall be conducted as follows:
- (1) Areas to be swept and maintained shall include at a minimum:
 - (A) general grounds, yard, and other open areas;
 - (B) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and
 - (C) grain driers with respect to accumulated particulate matter.
 - (2) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (b) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
- (1) Malfunctions.
 - (2) Breakdowns.

- (3) Improper adjustment.
- (4) Operating above the rated or designed capacity.
- (5) Not following designed operating specifications.
- (6) Lack of good preventative maintenance care.
- (7) Lack of critical and proper spare replacement parts on hand.
- (8) Lack of properly trained and experienced personnel.
- (c) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.4.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.4.4 Visible Emissions Notations

- (a) Once per day visible emission notations of the Elevator Grain Loadout (Unit ID EGLO) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)][326 IAC 2-8-16]

D.4.5 Record Keeping Requirements

- (a) To document compliance with Condition D.4.1 the Permittee shall maintain a monthly record of the total amount of grain shipped, in tons, by the Elevator Grain Loadout (Unit ID EGLO).
- (b) To document compliance with Condition D.4.4, the Permittee shall maintain a daily record of visible emission notations of the Elevator Grain Loadout (Unit ID EGLO) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e. the process did not operate that day).
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.4.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.5

FACILITY CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Bean Bowl

- (h) One (1) Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR), constructed in 1964, using addition of oil to the grain for particulate control, with a maximum capacity of 3.7 million bushels (111,000 tons).

Insignificant Activities

- (a) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
- (1) Bean Bowl Bin Vent aspiration of 0.005 grains/dry standard cubic foot having emissions less than permitting thresholds [326 IAC 6.5-1-2].

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.5.1 FESOP Limits PSD Minor Limits [326 IAC 2-2] [326 IAC 2-8]

- (a) The grain processed by the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) shall not exceed 150,000 tons, combined, per twelve (12) consecutive month period with compliance determined at the end of each month.
- (b) The PM emissions from the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) shall not exceed 0.63 lb per ton of grain processed.
- (c) The PM₁₀ emissions from the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) shall not exceed 0.16 lb per ton of grain processed.

These limits, combined with the limits in Conditions D.1.1, D.2.1, D.3.1, and D.4.1, will limit source wide emissions of PM₁₀ to less than 100 tons per year and source wide emissions of PM to less than 250 tons per year. Compliance with these limitations render the source a PSD minor source and the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable.

D.5.2 Particulate Emission Limitations [326 IAC 6.5-1-2]

Pursuant to 326 IAC 6.5-1-2(d)(2), the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL), one (1) Bean Bowl Storage and Removal (BBSR), and the Bean Bowl Bin Vent are subject to the following requirements:

- (a) Housekeeping practices shall be conducted as follows:
- (1) Areas to be swept and maintained shall include at a minimum:
- (A) general grounds, yard, and other open areas;
- (B) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and
- (C) grain driers with respect to accumulated particulate matter.

- (2) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
- (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
- (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (b) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (1) Malfunctions.
 - (2) Breakdowns.
 - (3) Improper adjustment.
 - (4) Operating above the rated or designed capacity.
 - (5) Not following designed operating specifications.
 - (6) Lack of good preventative maintenance care.
 - (7) Lack of critical and proper spare replacement parts on hand.
 - (8) Lack of properly trained and experienced personnel.
- (c) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

D.5.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.5.4 Visible Emissions Notations

- (a) Once per day visible emission notations of the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) A visual check shall be performed once per day during periods that grain is being processed to ensure that food grade oil is being spray applied to all processed grain. The application rate shall be maintained at no less than one (1) gallon of food grade oil spray applied per 1000 bushels (30 tons) of grain received. If examination of the nozzles indicates clogging or spraying at a lower than specified application rate, corrective action will be implemented per the Response to Excursions or Exceedances.

- (f) If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.5.5 Record Keeping Requirements

- (a) To document compliance with Condition D.5.1 the Permittee shall maintain a monthly record of the combined total amount of grain processed, in tons, by Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR).
- (b) To document compliance with Condition D.5.4, the Permittee shall maintain a daily record of visible emission notations of the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) stack exhaust. The Permittee shall include in its daily record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e. the process did not operate that day).
- (c) To document compliance with Condition D.5.4, the Permittee shall maintain a daily record of visual checks of spray application of food grade oil to all processed grain. The Permittee shall include in its daily record when a visual check notation is not taken and the reason for the lack of a visual check (i.e. the process did not operate that day).
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.5.6 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.5.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
and
City of Indianapolis
Office of Environmental Services**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- ☐ Annual Compliance Certification Letter
- ☐ Test Result (specify)
- ☐ Report (specify)
- ☐ Notification (specify)
- ☐ Affidavit (specify)
- ☐ Other (specify)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865**

**and
City of Indianapolis
Office of Environmental Services**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008

This form consists of 2 pages

Page 1 of 2

- ☐ This is an emergency as defined in 326 IAC 2-7-1(12)
- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and
 - The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
City of Indianapolis
Office of Environmental Services**

FESOP Quarterly Report

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008
Facility: Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area
No. 2 (Unit ID R2) (Section D-1)
Parameter: Grain received
Limit: 450,000 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
City of Indianapolis
Office of Environmental Services**

FESOP Quarterly Report

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008
Facility: Berico Column Grain Dryer (Unit ID GD) (Section D-2)
Parameter: Grain dried
Limit: 60,000 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
City of Indianapolis
Office of Environmental Services**

FESOP Quarterly Report

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008
Facility: Grain Dryer Conveyance System (Unit ID GDSCS) (Section D-3)
Parameter: Grain processed
Limit: 60,000 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
City of Indianapolis
Office of Environmental Services**

FESOP Quarterly Report

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008
Facility: Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) (Section D-3)
Parameter: Grain processed
Limit: 450,000 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
City of Indianapolis
Office of Environmental Services**

FESOP Quarterly Report

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008
Facility: Loader Equipment in Elevator Belt Conveying System (Unit ID TE) (Section D-3)
Parameter: Grain processed
Limit: 450,000 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
City of Indianapolis
Office of Environmental Services**

FESOP Quarterly Report

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008
Facility: Elevator Grain Loadout (Unit ID EGLO) (Section D-4)
Parameter: Grain shipped
Limit: 450,000 tons per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
City of Indianapolis
Office of Environmental Services**

FESOP Quarterly Report

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008
Facility: Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) (Section D-5)
Parameter: Grain processed
Limit: 150,000 tons, combined, per twelve (12) consecutive month period

QUARTER: _____ YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ☐ No deviation occurred in this quarter.
- ☐ Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**and
City of Indianapolis
Office of Environmental Services**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Bunge North America (East), Inc.
Source Address: 1102 West 18th Street, Indianapolis, IN 46202
Mailing Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP No.: F097-17173-00008

Months: _____ to _____ Year: _____

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

ATTACHMENT A

Bunge North America (East), Inc. Fugitive Dust Control Plan 326 IAC 6-5

1. Name and Address of Source

Bunge North America (East), Inc.
1102 West 18th Street
Indianapolis, IN 46202

2. Control Measures: Roadways and Parking Area

Fugitive particulate emissions from the paved roadways and parking areas shall be controlled by periodic sweeping or watering on an "as needed" basis. Spills shall be cleaned up by the end of the business day.

3. Control Measures: Truck Dump

Fugitive particulate emissions from the truck pit receiving area and the rail pit receiving area shall be controlled by the use of shrouds or three-sided enclosures that minimize exposure of the transferred grain to wind.

4. Control Measures: Bean Bowl Receiving and Conveyors

Fugitive particulate emissions from the bean bowl receiving operations shall be controlled with dust control oil. Degummed soybean oil shall be applied to beans in the bean receiving conveyors. A level switch in the conveyor shall indicate if beans are present. The switch shall be interlocked to the dust suppression oil pump. If the switch indicates beans are present, the pump shall operate and spray oil into the beans on the conveyor at a rate of approximately 1 gallon of oil per 1000 bushels (30 tons) of beans received. The conveyors shall be covered.

5. Control Measures: Bean Bowl Storage

Dust control oil is applied at receiving, therefore, the grain stored in the Bean Bowl does have oil on it and dust is suppressed. Bin vent filters shall be in place to control any fugitive particulate that may arise from grain receiving and handling operations.

6. Control Measures: Loading

Fugitive particulate emissions from the loading operations shall be controlled by controlling the drop height of the grain, using extendable spouts and by adding oil to the grain for particulate control at a rate of approximately 1 gallon of oil per 1000 bushels (30 tons) of beans.

7. Site-wide Housekeeping Practices

(a) In addition to the above, the following additional site-wide housekeeping practices shall be conducted as follows:

(1) Areas to be swept and maintained shall include at a minimum:

(A) general grounds, yard, and other open areas;

(B) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and

(C) grain driers with respect to accumulated particulate matter.

- (2) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (b) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (1) Malfunctions.
 - (2) Breakdowns.
 - (3) Improper adjustment.
 - (4) Operating above the rated or designed capacity.
 - (5) Not following designed operating specifications.
 - (6) Lack of good preventative maintenance care.
 - (7) Lack of critical and proper spare replacement parts on hand.
 - (8) Lack of properly trained and experienced personnel.

-

UNPAVED AREA

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SUB-STATION

**Indiana Department of Environmental Management
Office of Air Quality**

and

**City of Indianapolis
Office of Environmental Services**

**Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	Bunge North America (East), Inc.
Source Location:	1102 West 18th Street, Indianapolis, IN 46202
County:	Marion
SIC Code:	5153
Operation Permit No.:	F097-5485-00008
Operation Permit Issuance Date:	November 30, 1998
Permit Renewal No.:	F097-17173-00008
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) and the Office of Environmental Services (OES) have reviewed a FESOP renewal permit application from Bunge North America (East), Inc. relating to the operation of a grain (including corn and soybean) terminal. Bunge North America (East), Inc. was issued FESOP 097-5485-00008 on November 30, 1998.

Background

On December 31, 2003, Central Soya Company submitted an application to IDEM, OAQ and OES for a name change. That permit application (097-18593-0008) has been combined into this FESOP renewal 097-17173-00008. The name of the company has been changed to Bunge North America (East), Inc.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

Receiving

- (a) One (1) Truck Pit Receiving Area No. 1, designated as Emission Unit ID R1, constructed in 1949, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 324 tons of grain per hour, exhausting to stack R1.
- (b) One (1) Truck and Rail Pit Receiving Area No. 2, designated as Emission Unit ID R2, constructed in 1964, using a baghouse and oil spray as control, with a maximum throughput of 400 tons of grain per hour, exhausting to stack R2.

Drying

- (c) One (1) Berico Column Grain Dryer, designated as Emission Unit ID GD, constructed in 1949, using a 300 micron mesh screen to remove large particles, with a maximum throughput of 45 tons of grain per hour, equipped with a 14.5 million British Thermal Unit (MMBTU) per hour natural gas combustion source, exhausting to stack GD.

Internal Operations

- (d) One (1) Grain Dryer Conveyance System, designated as Emission Unit ID GDCS, constructed in 1959, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 45 tons of grain per hour, exhausting to stack GDCS.
- (e) One (1) Tripper Equipment in Elevator Belt Conveying System, designated as Emission Unit ID TE, constructed in 1949, using two (2) baghouses and addition of oil to the grain as control, with a maximum throughput of 450 tons of grain per hour, exhausting to stacks TE-W and TE-E.
- (f) One (1) Loader Equipment in Elevator Belt Conveying System, designated as Emission Unit ID LE, constructed in 1949, using a baghouse and addition of oil to the grain as control, with a maximum throughput of 450 tons of grain per hour, exhausting to stack LE.

Shipping

- (g) One (1) Elevator Grain Loadout, designated as Emission Unit ID EGLO, constructed in 1964, using the addition of oil to the grain for particulate control, with a maximum throughput of 150 tons of grain per hour.
- (h) One (1) Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR), constructed in 1964, using addition of oil to the grain for control, with a maximum capacity of 3.7 million bushels (111,000 tons).

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review.

New Emission Units and Pollution Control Equipment Receiving New Source Review Approval

There are no new emission units and pollution control equipment receiving new source review approval at this source during this review.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Activities with emissions equal to or less than the following thresholds: 5 lb/hr or 25 lb/day PM; 5 lb/hr or 25 lb/day SO₂; 5 lb/hr or 25 lb/day NO_x; 3 lb/hr or 15 lb/day VOC; 0.6 tons per year Pb; 1.0 ton/yr of a single HAP, or 2.5 ton/yr of any combination of HAPs:
 - (1) Bean Bowl Bin Vent aspiration of 0.005 grains/dry standard cubic foot having emissions less than permitting thresholds [326 IAC 6.5-1-2].
- (b) Paved and unpaved roads and parking lots with public access [326 IAC 6-4].
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

- (d) Cleaners and solvents having a vapor pressure equal to or less than 0.7 kPa; 5 mm Hg; or 0.1 psi measured at 20°C (68°F); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (e) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (f) Asbestos abatement projects regulated by 326 IAC 14-10.
- (g) Purging of gas lines and vessels that are related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (h) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (i) Underground conveyors.

Existing Approvals

This source has been operating under the previous FESOP 097-5485-00008, issued on November 30, 1998 with an expiration date of November 30, 2003, and the following amendment and revisions:

- (a) Administrative Amendment 097-10685-00008, issued March 9, 1999.
- (b) Minor Permit Revision 097-10971-00008, issued August 4, 1999.
- (c) Administrative Amendment 097-12479-00008, issued July 27, 2000.
- (d) Reopening 097-13078-00008, issued October 1, 2001.

The following terms and conditions from previous approvals have been determined to be no longer applicable; therefore, the following were not incorporated into this FESOP renewal:

- (a) F097-5485-00008, issued on November 30, 1998: Conditions D.1.2 (a) and (b) and D.2.2 (a) through (c) (Particulate Matter Less than Ten (10) Microns (PM10) [326 IAC 2-8-4 (1)]) were not incorporated.

Reason not incorporated: These conditions provided PM10 emission limits in the form of tons per year. The conditions were not incorporated because the limits, as written, were not practically enforceable. The limits were replaced with annual throughput and short term pound per ton limits such that compliance can be determined through record keeping on a twelve (12) consecutive month basis.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP Renewal permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on January 28, 2003.

Emission Calculations

See Appendix A pages 1 through 4 of this document for detailed emissions calculations.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Potential To Emit (tons/year)
PM	2,550.59
PM10	798.74
SO ₂	0.04
VOC	0.35
CO	5.33
NO _x	6.35

Note: For the purpose of determining Title V applicability for particulates, PM10, not PM, is the regulated pollutant in consideration.

HAPs	Unrestricted Potential Emissions (tons/yr)
Benzene	Neg.
Dichlorobenzene	Neg.
Formaldehyde	Neg.
Hexane	Neg.
Toluene	Neg.
Lead	Neg.
Cadmium	Neg.
Chromium	Neg.
Manganese	Neg.
Nickel	Neg.
TOTAL	Neg.

Neg. = Negligible

Negligible indicates potential emissions of less than 0.1 tons per year.

- The unrestricted potential emissions of PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Part 70 permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Part 70 Operating Permit emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).
- Fugitive Emissions**
 This type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2. This source is in a category regulated by Section 111 of the Clean Air Act (40 CFR 60, Subpart DD - grain terminal with a storage capacity greater than 2.5 million bushels) and that regulation was in effect on August 7, 1980. Therefore, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are counted toward determination of PSD and Emission Offset applicability.

Potential to Emit After Issuance

The source, issued a FESOP on November 30, 1998, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the

source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F097-5485-00008; issued on November 30, 1998).

Process/facility	Potential to Emit After Issuance (tons/year)						
	PM	PM10	SO ₂	VOC	CO	NO _x	HAPs
Truck and Rail Receiving ^(a) (R1 and R2)	40.5	13.28	0	0	0	0	0
Grain Dryer (including combustion) ^(b) (GD)	6.60	1.65	0.04	0.35	5.33	6.35	0.12
Grain Dryer Conveyor ^(c) (GDCS)	1.83	1.02	0	0	0	0	0
Tripper Equipment ^(d) (TE)	13.73	7.65	0	0	0	0	0
Loader Equipment ^(e) (LE)	13.73	7.65	0	0	0	0	0
Grain Loadout ^(f) (EGLO)	19.35	6.53	0	0	0	0	0
Bean Bowl ^(g) (BBC, BBL, and BBSR)	46.88	12.0	0	0	0	0	0
Paved and Unpaved Roads	2.45	0.43	0	0	0	0	0
Total Emissions	Less than 250	Less than 100	0.04	0.35	5.33	6.35	0.12

Potential to Emit for PM and PM10 for R1, R2, GD, GDCS, TE, LE, EGLO, BBC, BBL, and BBSR represent allowable emissions under 326 IAC 2-2 (PSD) and 326 IAC 2-8 (FESOP) limits in the permit.

(a) Potential to emit of PM and PM10 for units R1 and R2 is based on the throughput limit of 450,000 tons per 12 consecutive month period of grain received.

(b) Potential to emit of PM and PM10 for unit GD is based on the throughput limit of 60,000 tons per 12 consecutive month period of grain dried.

(c) Potential to emit of PM and PM10 for unit GDCS is based on the throughput limit of 60,000 tons per 12 consecutive month period of grain dried.

(d) Potential to emit of PM and PM10 for unit TE is based on the throughput limit of 450,000 tons per 12 consecutive month period of grain received.

(e) Potential to emit of PM and PM10 for unit LE is based on the throughput limit of 450,000 tons per 12 consecutive month period of grain received.

(f) Potential to emit of PM and PM10 for unit EGLO is based on the throughput limit of 450,000 tons per 12 consecutive month period of grain shipped.

(g) Potential to emit of PM and PM10 for the Bean Bowl is based on the throughput limit of 150,000 tons per 12 consecutive month period of grain processed.

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM10	unclassifiable
PM2.5	nonattainment
SO ₂	attainment
NO ₂	attainment
8-Hour Ozone	basic nonattainment
CO	attainment
Lead	attainment

- (a) Marion County has been classified as nonattainment for PM_{2.5} in 70 FR 943 dated January 5, 2005. Until U.S. EPA adopts specific New Source Review rules for PM_{2.5} emissions, it has directed states to regulate PM₁₀ emissions as a surrogate for PM_{2.5} emissions pursuant to the Non-attainment New Source Review requirements. See the State Rule Applicability for the source section.
- (b) Volatile organic compounds (VOC) and Nitrogen Oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as nonattainment for 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3. See the State Rule Applicability for the source section.
- (c) Marion County has been classified as attainment or unclassifiable in Indiana for PM₁₀, SO₂, NO_x, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements of Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.
- (d) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

Federal Rule Applicability

- (a) The requirements of 40 CFR 60, Subpart DD (Standards of Performance for Grain Elevators) are not included in this permit. This source was constructed prior to August 3, 1978, the applicability date for this rule and has not been modified or reconstructed after that date.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14 and 40 CFR Part 63) included in this permit.
- (c) The provisions of 40 CFR Part 64, Compliance Assurance Monitoring are not included in this permit. In order for this rule to apply, a pollutant-specific-emissions-unit at a source that requires a Part 70 or Part 71 permit must meet three criteria for a given pollutant: 1) the unit is subject to an applicable emission limitation or standard for the applicable regulated air pollutant, 2) the unit uses a control device to achieve compliance with any such emission limitation or standard, and 3) the unit has the potential to emit, of the applicable regulated air pollutant, equal or greater than 100 percent of the amount required for a source to be classified as a major source. Additionally the source must be subject to Part 70 permit program rules. This source has applied for a FESOP, therefore, no emission units at this source meet the above criteria.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source does not belong to 1 of the 28 source categories. The source was constructed prior to the promulgation of the PSD regulations and was a major existing source upon promulgation of PSD rules. There were no modifications to the source after the promulgation of the PSD rules. On November 30, 1998, when the source received FESOP F097-5482-00008, they voluntarily accepted several production limits equivalent to PM and PM₁₀ emission of 108.37 and 34.06 tons per year, respectively. Therefore, upon issuance of that FESOP, the source became a PSD minor source.

The following limits ensure PSD minor source status:

- (a) The grain received by Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) shall not exceed 450,000 tons, combined, per twelve (12) consecutive month period and 0.18 pounds of PM per ton of grain received, with

compliance determined at the end of each month. This limit is equivalent to PM emissions of 40.5 tons, combined, per year.

- (b) The grain dried by the Berico Column Grain Dryer (Unit ID GD) shall not exceed 60,000 tons per twelve (12) consecutive month period and 0.22 pounds of PM per ton of grain received, with compliance determined at the end of each month. This limit is equivalent to PM emissions of 6.60 tons per year.
- (c) The grain dried by Grain Dryer Conveyance System (Unit ID GDCS) shall not exceed 60,000 tons per twelve (12) consecutive month period and 0.06 pounds of PM per ton of grain dried, with compliance determined at the end of each month. This limit is equivalent to PM emissions of 1.83 tons per year.
- (d) The grain received by Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) shall not exceed 450,000 tons per twelve (12) consecutive month period and 0.06 pounds of PM per ton of grain received, with compliance determined at the end of each month. This limit is equivalent to PM emissions of 13.73 tons per year.
- (e) The grain received by Loader Equipment in Elevator Belt Conveying System (Unit ID LE) shall not exceed 450,000 tons per twelve (12) consecutive month period and 0.06 pounds of PM per ton of grain received, with compliance determined at the end of each month. This limit is equivalent to PM emissions of 13.73 tons per year.
- (f) The grain shipped by the Elevator Grain Loadout (Unit ID EGLO) shall not exceed 450,000 tons per twelve (12) consecutive month period and 0.09 pounds of PM per ton of grain shipped, with compliance determined at the end of each month. This limit is equivalent to PM emissions of 19.35 tons per year.
- (g) The grain stored in the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) shall not exceed 150,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The PM emissions for the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) shall not exceed 0.63 pounds of PM per ton of grain processed. These limits are equivalent to PM emissions of 46.88 tons per year.

These limits are necessary to limit source-wide emissions of PM to less than 250 tons per year. Compliance with these limitations ensures PSD minor status. The PM10 limits discussed below under 326 IAC 2-8 limit the PM10 emissions to less than 100 tons per year.

326 IAC 2-3 (Emission Offset)

Marion County has been designated as non-attainment for PM2.5 in 70 FR 943 dated January 5, 2005. According to the April 5, 2005 EPA memo titled "Implementation of New Source Review Requirements in PM2.5 Nonattainment Areas" authored by Steve Page, Director of OAQPS, until EPA promulgates the PM2.5 major NSR regulations, states should assume that a major stationary source's PM10 emissions represent PM2.5 emissions. IDEM will use the PM10 nonattainment major NSR program as a surrogate to address the requirements of nonattainment major NSR for the PM2.5 NAAQS. A major source in a nonattainment area is a source that emits or has the potential to emit 100 tpy of any regulated pollutant. Bunge North America (East), Inc. has a limited potential to emit of PM10 below 100 tpy. Therefore, assuming that PM10 emissions represent PM2.5 emissions, 326 IAC 2-3 does not apply.

On April 15, 2004, the United States Environmental Protection Agency (U.S. EPA) named 23 Indiana counties and one partial county nonattainment for the new 8-hour ozone standard. The designations became effective on June 15, 2004. Marion County has been designated as nonattainment for the 8-hour ozone standard.

Since no modifications have been completed since the effective date of the 8-hour ozone standard, this source is not subject to any related requirements at this time. It is therefore

classified as a minor source for the 8-hour ozone standard under Emission Offset because it has the potential to emit less than 100 tons of VOC and NO_x per year. Any future modifications that increase VOC and NO_x emissions must be reviewed in accordance with 326 IAC 2-3.

326 IAC 2-4.1 (Hazardous Air Pollutants)

The source is not subject to the requirements of 326 IAC 2-4.1 because it has not constructed or reconstructed a major source of HAPs after July 27, 1997.

326 IAC 2-8 (FESOP)

The Permittee shall comply with the following requirements:

- (a) The grain received by Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) shall not exceed 450,000 tons, combined, per twelve (12) consecutive month period and 0.06 pounds of PM₁₀ per ton of grain received, with compliance determined at the end of each month. This limit is equivalent to PM₁₀ emissions of 13.28 tons, combined, per year.
- (b) The grain dried by the Berico Column Grain Dryer (Unit ID GD) shall not exceed 60,000 tons per twelve (12) consecutive month period and 0.06 pounds of PM₁₀ per ton of grain dried, with compliance determined at the end of each month. This limit is equivalent to PM₁₀ emissions of 1.65 tons per year.
- (c) The grain dried by Grain Dryer Conveyance System (Unit ID GDCS) shall not exceed 60,000 tons per twelve (12) consecutive month period and 0.03 pounds of PM₁₀ per ton of grain received, with compliance determined at the end of each month. This limit is equivalent to PM₁₀ emissions of 1.02 tons per year.
- (d) The grain received by Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) shall not exceed 450,000 tons per twelve (12) consecutive month period and 0.03 pounds of PM₁₀ per ton of grain received, with compliance determined at the end of each month. This limit is equivalent to PM₁₀ emissions of 7.65 tons per year.
- (e) The grain received by Loader Equipment in Elevator Belt Conveying System (Unit ID LE) shall not exceed 450,000 tons per twelve (12) consecutive month period and 0.03 pounds of PM₁₀ per ton of grain received, with compliance determined at the end of each month. This limit is equivalent to PM₁₀ emissions of 7.65 tons per year.
- (f) The grain shipped by the Elevator Grain Loadout (Unit ID EGLO) shall not exceed 450,000 tons per twelve (12) consecutive month period and 0.03 pounds of PM₁₀ per ton of grain shipped, with compliance determined at the end of each month. This limit is equivalent to PM₁₀ emissions of 6.53 tons per year.
- (g) The grain processed by the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) shall not exceed 150,000 tons per twelve (12) consecutive month period with compliance determined at the end of each month. The PM₁₀ emissions for the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) shall not exceed 0.16 pounds of PM₁₀ per ton of grain processed. These limits are equivalent to PM₁₀ emissions of 12.00 tons per year.

These limits are necessary to limit source wide emissions of PM₁₀ to less than 100 tons per year. Compliance with these limitations render the requirements of 326 IAC 2-7 (Part 70 Permit Program) not applicable. As discussed under 326 IAC 2-2, the PM₁₀ limitations also ensure PSD minor status.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The requirements of 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes) do not apply to this source because the source is subject to the requirements of 326 IAC 6.5-6.

326 IAC 6.5-6 (County Specific Particulate Matter Limitations)

The requirements of 326 IAC 6.5-6-5 applies to certain facilities at this source because it is located in Marion County and is specifically listed in 326 IAC 6.5-6-5.

The requirements of 326 IAC 6.5-1-2 apply to the facilities not specifically listed in 326 IAC 6.5-1-12 because the potential to emit particulate from the source is greater than 100 tons per year. See the State Rule Applicability sections below for details.

326 IAC 6-4 (Fugitive Dust Emissions)

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

The uncontrolled fugitive particulate emissions from the Roadways and Parking Area, Truck Dump, Bean Bowl Receiving and Conveyors, Bean Bowl Storage, and Loading are greater than 25 tons per year. Therefore, the Roadways and Parking Area, Truck Dump, Bean Bowl Receiving and Conveyors, Bean Bowl Storage, and Loading are subject to the requirements of 326 IAC 6-5. Pursuant to this rule, the source shall control fugitive emissions according to a Fugitive Dust Control Plan (FDCP). The plan is included as Attachment A to the FESOP Renewal.

State Rule Applicability - Grain Receiving (Truck Pit Receiving Area No. 1, Unit ID R1, and Truck and Rail Pit Receiving Area No. 2, Unit ID R2)

326 IAC 6.5-6-5 (Particulate Emission Limitations: Marion County)

The Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) are subject to the following limitations pursuant to 326 IAC 6.5-6-5 (Particulate Emission Limitations: Marion County) because they are specifically listed in 326 IAC 6.5-6-5. Pursuant to 326 IAC 6.5-6-5 particulate matter emissions from:

- (a) Truck Pit Receiving Area No. 1 (Unit ID R1) shall not exceed 7.23 tons per year and 0.006 grains (including corn and soybeans) per dry standard cubic foot.
- (b) Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) shall not exceed 4.95 tons per year and 0.006 grains per (including corn and soybeans) dry standard cubic foot.

The baghouses for particulate control shall be in operation at all times units R1 and R2 are in operation to ensure compliance with the requirements of 326 IAC 6.5-6-5.

326 IAC 8 (Volatile Organic Compounds)

The Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) are not subject to any 326 IAC 8 rules because they do not have the potential to emit VOC.

State Rule Applicability - Internal Operations (Grain Dryer Conveyance System, Unit ID GDCS, Tripper Equipment in Elevator Belt Conveying System, Unit ID TE, and Loader Equipment in Elevator Belt Conveying System, Unit ID LE)

326 IAC 6.5-6-5 (Particulate Emission Limitations: Marion County)

The Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE) are subject to the following limitations pursuant to 326 IAC 6.5-6-5 (Particulate Emission Limitations: Marion County) because they are specifically listed in 326 IAC 6.5-6-5. Pursuant to 326 IAC 6.5-6-5 particulate matter emissions from:

- (a) Tripper Equipment in Elevator Belt Conveying System (Unit ID TE) shall not exceed 0.92 tons per year and 0.006 grains (including corn and soybeans) per dry standard cubic foot.
- (b) Loader Equipment in Elevator Belt Conveying System (Unit ID LE) shall not exceed 0.70 tons per year and 0.006 grains (including corn and soybeans) per dry standard cubic foot.
- (c) Grain Dryer Conveyance System (Unit ID GDCS) shall not exceed 1.01 tons per year and 0.006 grains per dry standard cubic foot.

The baghouses for particulate control (Units TE, LE, and GDES) shall be in operation at all times to ensure compliance with 326 IAC 6.5-6-5.

326 IAC 8 (Volatile Organic Compounds)

The Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE) are not subject to any 326 IAC 8 rules because they do not have the potential to emit VOC.

State Rule Applicability - Grain Drying (Berico Column Grain Dryer, Unit ID GD)

326 IAC 6.5-1-2(d)(2) (Particulate Emission Limitations)

- (a) The Berico Column Grain Dryer (Unit ID GD) is subject to the requirements of 326 IAC 6.5-1-2(d)(2) (Particulate Emission Limitations) because the source has the potential to emit particulate matter greater than 100 tons per year and Unit ID GD is not specifically listed in 326 IAC 6.5-6-5. The Berico Column Grain Dryer (Unit ID GD) is not subject to 326 IAC 6.5-1-2(d)(1) because the source does not have permanent grain storage capacity of 2.5 million bushels.

Pursuant to 326 IAC 6.5-1-2(d)(2), the Berico Column Grain Dryer (Unit ID GD) is subject to the following requirements:

- (1) Housekeeping practices shall be conducted as follows:
 - (A) Areas to be swept and maintained shall include at a minimum:
 - (i) general grounds, yard, and other open areas;
 - (ii) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and
 - (iii) grain driers with respect to accumulated particulate matter.
 - (B) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.

- (C) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (D) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (2) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (A) Malfunctions.
 - (B) Breakdowns.
 - (C) Improper adjustment.
 - (D) Operating above the rated or designed capacity.
 - (E) Not following designed operating specifications.
 - (F) Lack of good preventative maintenance care.
 - (G) Lack of critical and proper spare replacement parts on hand.
 - (H) Lack of properly trained and experienced personnel.
- (3) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.
- (b) The natural gas-fired combustion source on the Berico Column Grain Dryer (Unit ID GD) is subject to the requirements of 326 IAC 6.5-1-2(a).

Pursuant to 326 IAC 6.5-1-2(a) (Particulate Emission Limitations for General Sources), the particulate matter emissions from the Berico Column Grain Dryer process heater shall be limited to 0.03 grains per dry standard cubic feet.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The Berico Column Grain Dryer (Unit ID GD) is not subject to the requirements of 326 IAC 8-1-6 (New Facilities; General Reduction Requirements) because it was constructed prior to January 1, 1980 the applicability date of this rule, and it has the potential to emit less than twenty-five (25) tons of VOC per year.

326 IAC 8 (Volatile Organic Compounds)

The Berico Column Grain Dryer (Unit ID GD) is not subject to the requirements of any 326 IAC 8 rules because it does not engage in any operations specifically limited by these rules.

State Rule Applicability - Shipping (Elevator Grain Loadout, Unit ID EGLO)

326 IAC 6.5-1-2 (Particulate Emission Limitations)

The Elevator Grain Loadout (Unit ID EGLO) is subject to the requirements of 326 IAC 6.5-1-2(d)(2) (Particulate Emission Limitations) because the source has the potential to emit particulate matter greater than 100 tons per year and Unit ID EGLO is not specifically listed in 326 IAC 6.5-6-5. The Elevator Grain Loadout (Unit ID EGLO) is not subject to 326 IAC 6.5-1-2(d)(1) because the source does not have permanent grain storage capacity of 2.5 million bushels.

Pursuant to 326 IAC 6.5-1-2(d)(2), the Elevator Grain Loadout (Unit ID EGLO) is subject to the following requirements:

- (a) Housekeeping practices shall be conducted as follows:

- (1) Areas to be swept and maintained shall include at a minimum:
 - (A) general grounds, yard, and other open areas;
 - (B) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and
 - (C) grain driers with respect to accumulated particulate matter.
- (2) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
- (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
- (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (b) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (1) Malfunctions.
 - (2) Breakdowns.
 - (3) Improper adjustment.
 - (4) Operating above the rated or designed capacity.
 - (5) Not following designed operating specifications.
 - (6) Lack of good preventative maintenance care.
 - (7) Lack of critical and proper spare replacement parts on hand.
 - (8) Lack of properly trained and experienced personnel.
- (c) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

326 IAC 8 (Volatile Organic Compounds)

The Elevator Grain Loadout (Unit ID EGLO) is not subject to any 326 IAC 8 rules because it does not have the potential to emit VOC.

State Rule Applicability - Bean Bowl (Bean Bowl Conveyor, Unit ID BBC, Bean Bowl Leg, Unit ID BBL, and Bean Bowl Storage and Removal, Unit ID BBSR)

326 IAC 6.5-1-2 (Particulate Emission Limitations)

The Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) is subject to the requirements of 326 IAC 6.5-1-2(d)(2) (Particulate Emission Limitations) because the source has the potential to emit particulate matter greater than 100 tons per year and the Bean Bowl is not specifically listed in 326 IAC 6.5-6-5. The Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) is not subject to 326 IAC 6.5-1-2(d)(1) because the source does not have permanent grain storage capacity of 2.5 million bushels.

Pursuant to 326 IAC 6.5-1-2(d)(2), the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) is subject to the following requirements:

- (a) Housekeeping practices shall be conducted as follows:
 - (1) Areas to be swept and maintained shall include at a minimum:
 - (A) general grounds, yard, and other open areas;
 - (B) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and
 - (C) grain driers with respect to accumulated particulate matter.
 - (2) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (b) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (1) Malfunctions.
 - (2) Breakdowns.
 - (3) Improper adjustment.
 - (4) Operating above the rated or designed capacity.
 - (5) Not following designed operating specifications.
 - (6) Lack of good preventative maintenance care.
 - (7) Lack of critical and proper spare replacement parts on hand.
 - (8) Lack of properly trained and experienced personnel.
- (c) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

326 IAC 8 (Volatile Organic Compounds)

The Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) is not subject to any 326 IAC 8 rules because it does not have the potential to emit VOC.

State Rule Applicability - Insignificant Activities

326 IAC 6.5-1-2 (Particulate Emission Limitations)

The Insignificant Bean Bowl Bin Vent is subject to the requirements of 326 IAC 6.5-1-2(d)(2) (Particulate Emission Limitations) because the source has the potential to emit particulate matter greater than 100 tons per year and the Bin Vent is not specifically listed in 326 IAC 6.5-6-5. The Bin Vent is not subject to 326 IAC 6.5-1-2(d)(1) because the source does not have permanent grain storage capacity of 2.5 million bushels.

Pursuant to 326 IAC 6.5-1-2(d)(2), the Bean Bowl Bin Vent is subject to the following requirements:

- (a) Housekeeping practices shall be conducted as follows:
 - (1) Areas to be swept and maintained shall include at a minimum:
 - (A) general grounds, yard, and other open areas;
 - (B) floors, decks, hopper areas, loading areas, dust collectors, and all areas of dust or waster concentrations; and
 - (C) grain driers with respect to accumulated particulate matter.
 - (2) Cleanings and other collected waste material shall be handled and disposed of so that the area does not generate fugitive dust.
 - (3) Dust from driveways, access roads, and other areas of travel shall be controlled.
 - (4) Accidental spills and other accumulations shall be cleaned up as soon as possible but not later than completion of the day's operation.
- (b) Equipment maintenance shall consist of procedures that eliminate or minimize emissions from equipment or a system caused by the following:
 - (1) Malfunctions.
 - (2) Breakdowns.
 - (3) Improper adjustment.
 - (4) Operating above the rated or designed capacity.
 - (5) Not following designed operating specifications.
 - (6) Lack of good preventative maintenance care.
 - (7) Lack of critical and proper spare replacement parts on hand.
 - (8) Lack of properly trained and experienced personnel.
- (c) Emissions from the affected areas, operations, equipment, and systems shall not exceed twenty percent (20%) opacity as determined pursuant to 326 IAC 5-1.

Testing Requirements

PM and PM10 testing is required for facilities R1 and R2 in order to determine compliance with the 326 IAC 6.5-6-5 limits. AP 42 emission factors predict that these emission units, after production throughput limits, will not be in compliance with the 326 IAC 6.5-6-5 particulate limits in the permit before the effect of controls. Also, the amounts of PM and PM10 emitted from these emission units represents a large percentage of the total emissions of these pollutants from the source before controls. Therefore, testing is required to ensure that the controls operate properly and the source is in compliance with the requirements of 326 IAC 6.5-6-5. Testing will also show that these emission units are in compliance with the applicable limits in 326 IAC 2-2 (PSD) and 326 IAC 2-8 (FESOP). AP 42 emission factors predict that these emission units, after production throughput limits, will be in compliance with the 326 IAC 2-2 (PSD) and 326 IAC 2-8 (FESOP) limits in the permit before the effect of controls.

Testing is not required for facilities GD, GDCS, TE, LE, BBC and EGLO. The amounts of PM and PM10 emitted from these emission units represents a small percentage of the total emissions of these pollutants from the source before controls. Additionally, the emission factors used to calculate the potential to emit from these emission units do not take into consideration the source's use of oil for dust control at these facilities, which, according to AP-42, Chapter 9.9.1, may result in "a PM reduction of approximately 60 to 80 percent." Therefore, the emission factor used in calculating the emissions from these facilities is very conservative. The housekeeping practices, equipment maintenance and opacity monitoring requirements specified in 326 IAC 6.5-1-2, combined with the throughput limits, are considered adequate for assuring compliance with the applicable limits in 326 IAC 2-2 (PSD) and 326 IAC 2-8 (FESOP).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) have applicable compliance monitoring conditions as specified below:
 - (a) Once per day visible emission notations of the Truck Pit Receiving Area No. 1 (Unit ID R1, stack R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2, stack R2) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
 - (b) The Permittee shall record the pressure drop across each baghouse used in conjunction with the Truck Pit Receiving Area No. 1 (Unit ID R1) and Truck and Rail Pit Receiving Area No. 2 (Unit ID R2) at least once per day. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with

Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The instrument used for determining the pressure shall comply with Section C - Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

- (c) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (d) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (e) Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-2, 326 IAC 2-8, and 326 IAC 6.5-6-5.

2. The Berico Column Grain Dryer (Unit ID GD) has applicable compliance monitoring conditions as specified below:

Once per day visible emission notations of the Berico Column Grain Dryer (Unit ID GD) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-2, 326 IAC 2-8 and 326 IAC 6.5-1-2(d)(2).

3. The Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), Loader Equipment in Elevator Belt Conveying System (Unit ID LE) have applicable compliance monitoring conditions as specified below:

- (a) Once per day visible emission notations of the Grain Dryer Conveyance System (Unit ID GDCS, stack GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE, stacks TE-E and TE-W), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE, stack LE) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.
- (b) The Permittee shall record the pressure drop across each baghouse used in conjunction with the Grain Dryer Conveyance System (Unit ID GDCS), Tripper Equipment in Elevator Belt Conveying System (Unit ID TE), and Loader Equipment in Elevator Belt Conveying System (Unit ID LE), at least once per day. When for any one reading, the pressure drop across the baghouse is outside the normal range of 1.0 and 10.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances, shall be considered a deviation from this permit. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months. The instrument used for determining the pressure shall comply with Section C - Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
- (c) For a single compartment baghouse controlling emissions from a process operated continuously, a failed unit and the associated process shall be shut down immediately until the failed unit has been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (d) For a single compartment baghouse controlling emissions from a batch process, the feed to the process shall be shut down immediately until the failed unit has been repaired or replaced. The emissions unit shall be shut down no later than the completion of the processing of the material in the emissions unit. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (e) Bag failure can be indicated by a significant drop in the baghouse's pressure reading with abnormal visible emissions, by an opacity violation, or by other means such as gas temperature, flow rate, air infiltration, leaks, dust traces or triboflows.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-2, 326 IAC 2-8 and 326 IAC 6.5-6-5.

4. The Elevator Grain Loadout (Unit ID EGLO) has applicable compliance monitoring conditions as specified below:

Once per day visible emission notations of the Elevator Grain Loadout (Unit ID EGLO) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. If abnormal emissions are observed, the Permittee shall take reasonable response steps in accordance with Section C - Response to Excursions or Exceedances. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-2, 326 IAC 2-8 and 326 IAC 6.5-1-2(d)(2).

5. The Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) have applicable compliance monitoring conditions as specified below:

Once per day visible emission notations of the Bean Bowl consisting of two (2) Bean Bowl Conveyors (BBC), one (1) Bean Bowl Leg (BBL) and one (1) Bean Bowl Storage and Removal (BBSR) stack exhaust shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. A visual check shall be performed once per day during periods that grain is being processed to ensure that food grade oil is being spray applied to all processed grain. The application rate shall be maintained at no less than one (1) gallon of food grade oil spray applied per 1000 bushels (30 tons) of grain received. If examination of the nozzles indicates clogging or spraying at a lower than specified application rate, corrective action will be implemented per the Response to Excursions or Exceedances.

These monitoring conditions are necessary to ensure compliance with 326 IAC 2-2, 326 IAC 2-8 and 326 IAC 6.5-1-2(d)(2).

Conclusion

The operation of this grain terminal shall be subject to the conditions of the attached proposed FESOP Renewal No. F097-17173-00008.

**TSD Appendix A: Emission Calculations
Grain Processing Operations**

Page 1 of 4 TSD App A

Company Name: Bunge North America (East), Inc.
Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP: F097-17173-00008
Reviewer: ERG/ST
Date: January 26, 2007

Unlimited

Max (tons/hour)	Max (tons/year)	Max (bushels/hour)	Max (bushels/year)	Emissions (tons/year)	
				PM	PM-10
450	3,942,000	15,000	131,400,000	2,550.47	798.26

According to 3/15/96 FESOP App, a total of 724 tons of grain/hr can be received. A max of 450 tons per hour can be loaded into silos.
Source elects to have 15 MM bushels throughput (5 MM bushels to bean bowl and 2 MM bushels dried) as max capacity to enforceably restrict PTE.

Methodology

Emissions tons/year= max tons/hour * Total emission factor lbs/ton * 8760 hours/year * 1/2000 lb/ton

Grain Received (Throughput)		
	Limited Potential bushels/yr	Limited Potential tons/yr
Grain (Corn)	15,000,000	450,000
Grain (Soybeans)	15,000,000	450,000
Wheat	-	-
Milo (Sorghum)	-	-
Mixed	-	-
Amount grain dried	2,000,000	60,000
Bean Bowl storage/transfer	5,000,000	150,000

Facility	Emission Factors (lb/ton)		Limited Potential (tons/year)		Control Efficiency		Controlled Potential (tons/year)	
	PM	PM-10	PM	PM-10	Oil	Baghouse	PM	PM-10
Receiving (Unit ID R1 and Unit ID R2)**								
Truck	0.18	0.059	40.5	13.3	80%	89.9%	0.82	0.27
Rail	0.032	0.0078	-	-	80%	89.9%	-	-
Total Receiving	0.18	0.059	40.5	13.3			0.82	0.27
Drying (Unit ID GD)								
Column	0.22	0.055	6.6	1.65	not used	not used	6.60	1.65
Total Drying	0.22	0.055	6.6	1.65			6.60	1.65
Internal Operations (Unit ID GDCS)								
Cleaning, Tunnel Belt,								
Gallery Belt, Headhouse	0.061	0.034	1.83	1.02	80%	99.9%	0.0004	0.0002
Total Internal Operations	0.061	0.034	1.83	1.02			0.0004	0.0002
Internal Operations (Unit ID TE)								
Cleaning, Tunnel Belt,								
Gallery Belt, Headhouse	0.061	0.034	13.7	7.65	80%	99.9%	0.0027	0.0015
Total Internal Operations	0.061	0.034	13.7	7.65			0.0027	0.0015
Internal Operations (Unit ID LE)								
Cleaning, Tunnel Belt,								
Gallery Belt, Headhouse	0.061	0.034	13.7	7.65	80%	99.9%	0.0027	0.0015
Total Internal Operations	0.061	0.034	13.7	7.65			0.0027	0.0015
Shipping (Unit ID EGLO)**								
Truck	0.086	0.029	19.4	6.53	80%	not used	3.87	1.31
Railcar	0.027	0.0022	-	-	80%	not used	-	-
Total Shipping	0.086	0.029	19.4	6.53			3.87	1.31
Bean Bowl*								
Sum	0.625	0.16	46.9	12.0	80%	not used	9.38	2.40
Sum	1.29	0.405	142.6	49.8			20.7	5.63

*Bean bowl emission factor was obtained from the original permit F097-5485-00008, Issued on November 30, 1998. All values and formulas were obtained from AP-42 Interim Section 9.9.1 Grain Elevators and Processes

Bean Bowl emission factor = (internal operations emfac - cleaning emfac)/10 * Dustiness Ratio = (tunnel belt emfac + gallery belt emfac + headhouse emfac)/10 * Dustiness Ratio

Bean Bowl emission factor = (0.72 + 0.06 + 1.74) lb/ton/10 * 2.5 = 0.625 lb/ton PM

Bean Bowl emission factor, PM-10 = 25% emfac for PM

** Assumed worst case scenario that all grain is received and shipped by truck.

Methodology

Emission factors are taken from AP-42 of Section 9.9.1 Grain Elevators & Processes. Table 9.9.1-1 shows uncontrolled particulate emission factors for grain elevators.

The emission factors shown are Table 9.9.1-1 values.

15 MM total throughput bushels/yr * 60 lbs/bushel * ton/2000 # = 450,000 tons/yr (51 tons per hour if 8760 hours per year)

5 MM total bean bowl bushels/yr * 60 lbs/bushel * ton/2000 # = 150,000 tons/yr

2 MM total grain dried bushels/yr * 60 lbs/bushel * ton/2000 # = 60,000 tons/yr

Potential emissions in tons/yr = max "limited" throughput (ton/yr) * emfac (lb/ton) * ton/2000 lbs. "Limited" throughput is 15 MM bushels total through; 5 MM bushels to bean bowl & 2 MM bushels dried.

TSD Appendix A: Emission Calculations
Natural Gas Combustion

Page 2 of 4 TSD App A

Company Name: Bunge North America (East), Inc.
Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP: F097-17173-00008
Reviewer: ERG/ST
Date: January 26, 2007

Heat Input Capacity
MMBtu/hr

14.5

Potential Throughput
MMCF/yr

124.5

Emission Factor in lb/MMCF	Pollutant						
	PM*	PM10*	SO2	NOx	VOC	CO	HAPs
	1.9	7.6	0.6	100.0 **see below	5.5	84.0	1.887
Potential Emission in tons/yr	0.12	0.47	0.04	6.23	0.34	5.23	0.12

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Methodology

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,020 MMBtu

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**TSD Appendix A: Emission Calculations
Fugitive Emissions From Paved Roads**

Company Name: Bunge North America (East), Inc.
Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP: F097-17173-00008
Reviewer: ERG/ST
Date: January 26, 2007

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = (k \times (sL/2)^a \times (w/3)^b - C) \times (1 - p/(4 \times 365))$$

where:

E = emission factor (lb/vehicle mile traveled) 0.7 (g/m²) (AP-42, Table 13.2.1-4)
sL = road surface silt loading (g/m²) = 27.5 tons
w = mean vehicle weight (tons) = 0.082 for PM and 0.016 for PM10
k = empirical constant = 0.65
a = empirical constant = 1.5
b = empirical constant = 0.00047 for PM and PM10
C = emission factor for exhaust, brake and tire wear 120
p = number of days per year with 0.01 inches precipitation

PM Emission Factor = $(0.082 \times (7.4/2)^{0.65} \times (14.1/3)^{1.5} - 0.00047) \times (1 - 120/1460) = 1.06 \text{ lbs/mile}$

PM10 Emission Factor = $(0.016 \times (7.4/2)^{0.65} \times (14.1/3)^{1.5} - 0.00047) \times (1 - 120/1460) = 0.21 \text{ lbs/mile}$

Length of Paved Roads in One Direction = 0.10 miles

2. Potential to Emit (PTE) of PM/PM10 Before Control from Paved Roads:

Vehicle Type	*Trucks per day	Average Vehicle Weight*	Total Trip Number*	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(trips/yr)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
Grain Truck Receiving	23.3	27.5	7,127	47.78%	13.14	1,354	0.71	0.14
Grain Truck Shipping	25.4	27.5	7,791	52.22%	14.36	1,480	0.78	0.15
Total	48.72	27.5		100%	27.5	2834	1.50	0.29

* This information is provided by the source.

Methodology

Average Vehicle Weight (ton) = (Weight of Unloaded Vehicles + Weight of Loaded Vehicles) / 2

Total Trip Number (trips/yr) = Trucks per day x 365 (days/yr)

Traffic Component (%) = Trucks per Day (by type) / Total Trucks per Day

Component Vehicle Weight = Avg. Vehicle Weight (tons) x Traffic Component (%)

(Note that the summation of the component vehicle weight equals the Mean Vehicle Weight.)

VMT(miles/yr) = Length of Paved Roads in One Direction (miles) x 2 x Total Trip Numbers (trips/yr)

PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x PM/PM10 Emission Factors (lbs/mile) x 1 tons/ 2000 lbs

3. Potential to Emit (PTE) of PM/PM10 after Control from Paved Roads:

The source proposed to use sweeping and watering to control fugitive dust emissions. The control efficiency from wet suppression is assumed to be 50%.

PTE of PM after Control = $1.5 \text{ tons/yr} \times (1-50\%) = 0.75 \text{ tons/yr}$

PTE of PM10 after Control = $0.29 \text{ tons/yr} \times (1-50\%) = 0.15 \text{ tons/yr}$

**TSD Appendix A: Emission Calculations
Fugitive Emissions From Unpaved Roads**

Company Name: Bunge North America (East), Inc.
Address: 1102 West 18th Street, Indianapolis, IN 46202
FESOP: F097-17173-00008
Reviewer: ERG/ST
Date: January 26, 2007

1. Emission Factors: AP-42

According to AP-42, Chapter 13.2.2 - Unpaved Roads (12/03), the PM/PM10 emission factors for unpaved roads can be estimated from the following equation:

$$E = k \times (s/12)^a \times (w/3)^b \times ((365 - p)/365)$$

where:

E = emission factor (lb/vehicle mile traveled) 0.35 % (AP-42, Table 13.2.2-1)
s = surface material silt content (%) = 27.5 tons
w = mean vehicle weight (tons) = 4.9 for PM and 1.5 for PM10
k = empirical constant = 0.7 for PM and 0.9 for PM10
a = empirical constant = 0.45 for PM and PM10
b = empirical constant = 120
p = number of days per year with 0.01 inches precipitation

PM Emission Factor = $4.9 \times (6.4/12)^{0.7} \times (14.1/3)^{0.45} \times ((365 - p)/365) = 0.75 \text{ lbs/mile}$

PM10 Emission Factor = $1.5 \times (6.4/12)^{0.9} \times (14.1/3)^{0.45} \times ((365 - p)/365) = 0.11 \text{ lbs/mile}$

Length of Unpaved Roads in One Direction = 0.09 miles

2. Potential to Emit (PTE) of PM/PM10 Before Control from Unpaved Roads:

Vehicle Type	*Trucks per day	Average Vehicle Weight*	Total Trip Number*	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(trips/yr)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
Grain Truck Receiving	23.3	27.5	7,127	47.78%	13.14	1,212	0.45	0.07
Grain Truck Shipping	25.4	27.5	7,791	52.22%	14.36	1,324	0.50	0.08
Total	48.72			100%	27.5	2536	0.95	0.14

* This information is provided by the source.

Methodology

Average Vehicle Weight (ton) = (Weight of Unloaded Vehicles + Weight of Loaded Vehicles) / 2

Total Trip Number (trips/yr) = Trucks per day x 365 (days/yr)

Traffic Component (%) = Trucks per Day (by type) / Total Trucks per Day

Component Vehicle Weight = Avg. Vehicle Weight (tons) x Traffic Component (%)

(Note that the summation of the component vehicle weight equals the Mean Vehicle Weight.)

VMT(miles/yr) = Length of Unpaved Roads in One Direction (miles) x 2 x Total Trip Numbers (trips/yr)

PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x PM/PM10 Emission Factors (lbs/mile) x 1 tons/ 2000 lbs

3. Potential to Emit (PTE) of PM/PM10 after Control from Unpaved Roads:

The source proposed to use wet suppression to control fugitive dust emissions. The control efficiency from wet suppression is assumed to be 50%.

PTE of PM after Control = 1 tons/yr x (1-50%) = 0.48 tons/yr

PTE of PM10 after Control = 0 tons/yr x (1-50%) = 0.07 tons/yr